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MEMO ENDORSED

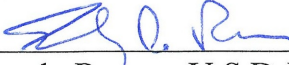
*NY AND CALIF. BARS

November 21, 2020

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

The jury trial is hereby rescheduled for September 7, 2021, at 9:30 a.m. The parties are advised that trial may be rescheduled to an earlier date if other cases on the Court's trial calendar settle.

SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: 11/25/2020
New York, New York

RE: United States v. Issak Almaleh and Antoaneta Iotova,
17 Cr. 25 (ER)

Your Honor:

I am writing on behalf of all the defense attorneys in this case, and after having discussed the issue with the prosecutors, to request that the trial date for this matter be moved to April, 2021, or such time later than that which is convenient for the Court. Our current trial date is January 19, 2021 (recently adjusted from January 11, 2021 due to the Court not having jury trials until January 19th).

I am making this application because I see that the Court administration has already cancelled jury trials for our District until January 18, 2021, and because I know that the number of Covid-19 protected courtrooms is very limited.

I am principally writing because I am 71 years old and I am very concerned that the level of outbreak of the Covid-19 virus will not be significantly reduced (if reduced at all) by January, and I am not willing to expose myself (and thus, also, my wife) to the virus in a manner that a jury trial with two defendants and four defense attorneys and at least two members of the government are attending for full trial days over the time necessary to complete

this trial (estimated to be three to four weeks).

I also note that both clients are somewhat high risk, especially Mr. Almaleh who suffers from obesity, high blood pressure, respiratory issues, and other health problems.

I have spoken with AUSA Robert B. Sobelman and AUSA Rebecca Dell (newly added to the case) and they state that while they will be ready for a trial in January that they understand my concerns and have no objection to the Court granting a postponement of the trial date.

One of my colleagues, Mr. Oksenhendler, is scheduled to try a case starting on March 1, 2020, and I would note that another of my colleagues, Mr. Spilke, is scheduled to start a trial on May 3, 2021 that should run through the month of May. My co-counsel for Ms. Iotova, Susan Marcus, is available throughout the Spring. I therefore would propose that we commence our trial anytime from mid-March or at through early April, 2021, depending, of course, on the Court's availability and the availability of a Covid-prepared courtroom. If that time-frame is not available for the Court I would propose any time after about mid-June after Mr. Spilke's trial is finished.

I am writing at this time so that we have as much advance notice as possible of the trial date in order to arrange the logistics of witness availability and of getting our clients up to New York from Florida where they are now residing.

Thank you.

Sincerely,

/s/ Thomas H. Nooter

THOMAS H. NOOTER

Attorney for Defendant Iotova, and
moving herein on behalf of both
defendants.

cc: AUSA Robert B. Sobelman, Esq., and
AUSA Rebecca Dell, Esq., by ECF